

**PASHMAN STEIN WALDER HAYDEN**

A Professional Corporation

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*Attorneys for Defendants*

Gannett Co., Inc., Gannett Satellite

Information Network, LLC, LocalIQ, LLC

and Jeramiah Martin

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANTOINETTE JUDY FAMULARE,

Plaintiff,

v.

GANNETT CO., INC., GANNETT  
SATELLITE INFORMATION  
NETWORK, LLC AND GANNETT  
SATELLITE INFORMATION  
NETWORK, Inc. d/b/a USA TODAY and  
USA NETWORK; LocalIQ, LLC;  
Jeramiah Martin, individually

Defendants.

Civil Action No.

**NOTICE OF REMOVAL**

**TO:** David Zatuchni, Esq.  
Zatuchni & Associates, LLC  
287 South Main Street  
Lambertville, NJ 08530

Hope Lang  
466 Kinderkamack Road  
Oradell, NJ 07640

*Attorneys for Plaintiff  
Antoinette Famulare*

**COUNSEL:**

Pursuant to 28 U.S.C. §§ 1441 and 1332, Defendants Gannett Co., Inc., Gannett Satellite Information Network, LLC (improperly pleaded as Gannett Satellite Information Network, Inc.), LocalIQ, LLC and Jeramiah Martin, hereby remove an action filed against them in the Superior Court of New Jersey, Bergen County, to the United States District Court for the District of New Jersey. In support of this notice, Defendants state as follows:

1. On August 14, 2020, Plaintiff Antoinette Judy Famulare filed a complaint against Defendants in the Superior Court of New Jersey, Law Division, Bergen County, captioned, ANTOINETTE FAMULARE vs. GANNETT CO., INC., GANNETT SATELLITE INFORMATION NETWORK, LLC AND GANNETT SATELLITE INFORMATION NETWORK, Inc. d/b/a USA TODAY and USA NETWORK; LOCALIQ, LLC; JERAMIAH MARTIN, individually, Docket. No. BER-L-4749-20 (the “State Action”) alleging claims under the New Jersey Law Against Discrimination. A true and correct copy of the Complaint is attached as Exhibit A.

2. On September 9, 2020, Plaintiff served Defendants Gannett Co., Inc., Gannett Satellite Information Network, LLC, and LocalIQ, LLC .

3. On September 16, 2020, Pashman Stein Walder Hayden, P.C., accepted service on behalf of Defendant Jeramiah Martin.

4. Plaintiff is a natural person and a citizen of the State of New Jersey. (Complaint at ¶ 1).

5. Defendant Jeramiah Martin is a natural person and a citizen of the State of Connecticut.

6. Defendant Gannett Co., Inc. is a Delaware corporation with a principal place of business in McLean, Virginia.

7. Defendant Gannett Satellite Information Network, LLC (GSIN) is a Delaware limited liability company with a principal place of business in McLean, Virginia.

8. Gannett Satellite Information Network, Inc. is improperly pleaded.

9. USA Today is an unincorporated division of GSIN.

10. GSIN is a wholly-owned subsidiary of Gannett Media Corp. (GMC).

11. GMC is a Delaware corporation with a principal place of business in McLean Virginia.

12. LocalIQ, LLC (LocalIQ) is a Delaware limited liability company with a principal place of business in McLean, Virginia.

13. LocalIQ is a wholly-owned subsidiary of GMC.

14. There is complete diversity between Plaintiff and Defendant.

15. The amount in controversy exceeds \$75,000.00.

16. This Court has original jurisdiction of the above-captioned matter pursuant to 28 U.S.C. § 1332 and, because Defendants are not residents of New Jersey, wherein the above-entitled action is pending, removal of the action to this Court is proper pursuant to 28 U.S.C. § 1441(a).

17. Defendants have filed this Notice of Removal within 30 days of the date that Plaintiff first served the Summons and Complaint upon one of them.

18. Defendants will provide written notification of the filing of this Notice to Plaintiff's counsel and will promptly file a copy of this filed Notice with the Clerk of the Court for the Superior Court of New Jersey, Law Division, Bergen County as required by 28 U.S.C. §

1446(d). Further, the attachment accompanying this Notice of Removal constitutes all process, pleadings and orders served upon Defendants in the State Action.

19. The State Action is pending in the County of Bergen, which is located in the District of New Jersey, Newark Vicinage.

**WHEREFORE**, Defendants hereby remove the State Action from the Superior Court of New Jersey, Law Division, Bergen County, Docket No. BER-L-004749-20, to the United States District Court for the District of New Jersey-Newark Vicinage, and requests such other and further relief to which they may be justly entitled.

**PASHMAN STEIN WALDER HAYDEN**  
A Professional Corporation  
Attorneys for Defendants

Dated: October 6, 2020

By: /s/ James W. Boyan III  
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